

Message

From: Nicholas Moore [nicholas.moore@anaergia.com]
Sent: 2/20/2018 7:00:35 PM
To: Brahmbhatt, Roshni [brahmbhatt.Roshni@epa.gov]
CC: Shailesh Patel [spatel@trinityconsultants.com]; Andrew Dale [Andrew.Dale@anaergia.com]
Subject: RE: CISWI Regulations - Pyrolysis
Attachments: RBF Pyrolysis Process Description.pdf

Flag: Follow up

Hello Roshni,

We spoke a couple weeks ago about the review of our pyrolysis project in Rialto, CA.

Do you have any idea when you may have the determination requested below?

Please let me know if you need any clarifications on this.

Thanks.

Nich Moore, PE
Project Engineer
E: nicholas.moore@anaergia.com
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From: Steven R. Walters [mailto:srwalters@trinityconsultants.com]
Sent: Monday, January 22, 2018 11:19 AM
To: Nicholas Moore <nicholas.moore@anaergia.com>; Andrew Dale <Andrew.Dale@anaergia.com>
Cc: Shailesh Patel <spatel@trinityconsultants.com>; Valerie Rosenkrantz <vrosenkrantz@insenv.com>
Subject: FW: CISWI Regulations - Pyrolysis

Nich,

As requested, we have forwarded the pyrolysis information to Region 9 for their review. For reference, here is the Region 9 contact provided by the South Coast AQMD:

Roshni Brahmbhatt
Environmental Engineer
Air and TRI Section (ENF 2-1)
Enforcement Division
U.S. Environmental Protection Agency, Region 9
Email: Brahmbhatt.Roshni@EPA.gov
Phone: 415-972-3995

Steve

From: Steven R. Walters
Sent: Monday, January 22, 2018 11:12 AM
To: 'Brahmbhatt, Roshni' <brahmbhatt.Roshni@epa.gov>
Subject: CISWI Regulations - Pyrolysis

Roshni,

Thank you for taking the time to review our question on federal applicability of a pyrolysis system being proposed by our client – Rialto Bioenergy Facility (RBF). As requested, we are attaching a process description of the proposed system prepared by RBF. Note that RBF has a pending permit application with the South Coast AQMD, which is being handled by Charlie Tupac's permitting group at the agency. Mr. Tupac wanted clarification on the applicability (or exemptions) of the following federal regulations for this system:

- (1) **CISWI - 40 CFR Part 60 Subpart CCCC** – new commercial and solid waste incineration.
- (2) **SSI - 40 CFR Part 60 Subpart LLLL** – new units at sewage treatment plants. The RBF site is not a sewage treatment plant, but is located adjacent to a POTW which may supply biosolid feedstock.
- (3) **OSWI - 40 CFR Part 60 Subpart EEEE** – new other incineration.

If there are any other federal regulations that may be applicable, please let us know. Since the RBF permit application is pending, any effort to expedite your review would be greatly appreciated. Our client is available to answer any questions, or we can schedule a conference call with RBF for additional clarifications. Thank you again.

Steve

STEVEN R. WALTERS, P.E., C.P.P. | Principal Consultant
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From: Brahmbhatt, Roshni [<mailto:brahmbhatt.Roshni@epa.gov>]
Sent: Friday, December 08, 2017 9:29 AM
To: Steven R. Walters <srwalters@trinityconsultants.com>
Subject: Re: CISWI Regulations - Pyrolysis

Hi Steven,

Apologies for the delay. I have worked on applicability determinations closely with the EPA Office of Air Quality Planning & Standards. I have a couple of examples that I can attach for you. If you can give me more information on the type of unit you are looking at, I should be able to get you an answer.

Thanks,

Roshni

From: Steven R. Walters <srwalters@trinityconsultants.com>

Sent: Friday, December 8, 2017 9:18 AM

To: Brahmbhatt, Roshni

Subject: Re: CISWI Regulations - Pyrolysis

Hi Roshni,

Just following up on my email below. If there is another Region 9 staff person that can provide guidance, we would appreciate any help or assistance that you can provide. Thank you.

Steve

From: "Steven R. Walters, P.E." <srwalters@trinityconsultants.com>

Date: Tuesday, December 5, 2017 at 2:16 PM

To: "Brahmbhatt.Roshni@EPA.gov" <Brahmbhatt.Roshni@EPA.gov>

Subject: CISWI Regulations - Pyrolysis

Hi Roshni,

Our office was referred to you by Charlie Tupac from the South Coast AQMD. We had a few questions on the applicability of federal Commercial and Industrial Solid Waste Incineration (CISWI) regulations for a pyrolysis unit that will process biosolids.

Our understanding is if the waste material is not combusted, these regulations would not apply but wanted to confirm with your office. Do you have a specific applicability determinations for pyrolysis systems? If you're available for a call later this week, please let us know what is convenient. Thank you, and let us know.

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